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Via ECF

The Honorable P. Kevin Castel
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *Bah v. Apple Inc., et al.*, No. 1:19-cv-03539 (PKC)
Plaintiff's Motion to Seal Apple's Confidential Document (ECF No. 77)

Dear Judge Castel:

We write on behalf of Defendant Apple Inc. ("Apple") regarding Plaintiff's motion to retroactively seal a confidential Apple document that Plaintiff publicly filed in violation of the protective order entered in this case. Plaintiff concedes that the document should not have been publicly filed, but Apple wishes to explain further the reason the relevant document should be sealed promptly. The relevant document contains commercially sensitive, confidential information detailing how a theft was committed at Apple's store (which provides a potential blueprint for future shoplifters), as well as whether and how Apple responded in real-time to that theft (which also could be used by potential shoplifters for nefarious purposes). Apple respectfully requests that the Court grant Plaintiff's Motion to Seal to avoid any continued prejudice or harm to Apple as a result of Plaintiff's violation.¹

Respectfully submitted,

/s/ *Carrie H. Cohen*

Carrie H. Cohen

cc: All counsel of record (via ECF)

¹ The next conference before the Court is scheduled for December 18, 2020.